

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

JOHN K. GOODROW, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	Civil No. 3:11CV020 (MHL)
	:	(Consolidated)
FRIEDMAN & MACFADYEN, P.A., <i>et al.</i> ,	:	
	:	
Defendants.	:	

**MOTION TO DENY PLAINTIFFS' REQUEST FOR PRODUCTION OF ENTIRETY OF
SERVERS AND DATABASES OF DEFENDANT FRIEDMAN & MACFADYEN, P.A.**

Plaintiffs have requested¹ that Defendants in this matter produce servers containing confidential and privileged information. For the reasons set out in the Memorandum in Support of this Motion, Defendants pray the Plaintiffs' request be denied.

¹ No pending discovery request seeks these servers and Plaintiffs have filed no motion to this effect. The request in this case is an oral one that Plaintiffs have made to the Court.

DATED: December 12, 2013

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.,
JOHNIE R. MUNCY, and
F&M SERVICES, L.C.,**

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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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